

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>In re:</b>	:	
	:	<b>Case No.: 24-13013</b>
<b>Joseph Corte Cann, Jr</b>	:	<b>Chapter 13</b>
	:	<b>Judge Ashely M. Chan</b>
<b>Debtor(s)</b>	:	<b>*****</b>
	:	
<b>JPMorgan Chase Bank, N.A.</b>	:	<b>Date and Time of Hearing</b>
	:	<b>Place of Hearing</b>
<b>vs</b>	:	<b>February 18, 2025 at 11:00 a.m.</b>
	:	
<b>Joseph Corte Cann, Jr</b>	:	<b>U.S. Bankruptcy Court</b>
<b>Eric Wright</b>	:	<b>900 Market Street, Suite 400, Courtroom</b>
<b>Kenneth E. West</b>	:	<b>#4</b>
<b>Respondents.</b>	:	<b>Philadelphia, PA, 19107</b>

**CERTIFICATION OF NO OBJECTION REGARDING**  
**MOTION FOR RELIEF FROM THE AUTOMATIC STAY AND CODEBTOR STAY AS**  
**TO ERIC WRIGHT TO PERMIT JPMORGAN CHASE BANK, N.A. TO REPOSSESS**  
**THE 2023 MITSUBISHI OUTLANDER SPORT WITH THE VEHICLE**  
**IDENTIFICATION NUMBER JA4ARUAU1PU013971 (DOCUMENT NO. 17)**

The undersigned hereby certifies that, as of the date hereof, no answer, objection or other responsive pleading to the Motion for Relief from the Automatic Stay and Codebtor Stay as to Eric Wright ("Motion") filed on January 30, 2025, at Document No. 17 has been received. The undersigned further certifies that the Court's docket in this case has been reviewed and no answer, objection or other responsive pleading to the Motion appears thereon. Pursuant to the Notice of Hearing, objections to the Motion were to be filed and served no later than February 14, 2025.

It is hereby respectfully requested that the Order attached to the Motion be entered by the Court.

/s/Stephen R. Franks  
Stephen R. Franks, Esquire (333394)  
Adam B. Hall (323867)  
MDK Legal

P.O. Box 165028  
Columbus, OH 43216-5028  
Telephone: 614-220-5611  
Fax: 614-627-8181  
Attorneys for Creditor  
The case attorney for this file is Stephen R.  
Franks.  
Contact email is [srfranks@mdklegal.com](mailto:srfranks@mdklegal.com)

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	:	<b>Case No.: 24-13013</b>
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	:	<b>Judge Ashely M. Chan</b>
<b>Debtor(s)</b>	:	<b>*****</b>
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<b>JPMorgan Chase Bank, N.A.</b>	:	<b>Date and Time of Hearing</b>
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<b>Joseph Corte Cann, Jr</b>	:	<b>U.S. Bankruptcy Court</b>
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<b>Kenneth E. West</b>	:	<b>#4</b>
<b>Respondents.</b>	:	<b>Philadelphia, PA, 19107</b>

**CERTIFICATE OF SERVICE**

I certify that on the date of filing, a copy of the foregoing Certificate of No Objection Regarding Motion for Relief from the Automatic Stay and Codebtor Stay to Permit JPMorgan Chase Bank, N.A. To Repossess the 2023 Mitsubishi Outlander Sport with the Vehicle Identification Number JA4ARUAU1PU013971 (Document No. 17) was filed electronically. Notice of this filing will be sent to the following parties through the Court's Electronic Case Filing System:

Office of U.S. Trustee, Party of Interest, (Registered address)@usdoj.gov

KENNETH E. WEST, Office of the Chapter 13 Standing Trustee,  
ecfemails@ph13trustee.com

MICHAEL A. CIBIK, Attorney for Joseph Corte Cann, Jr, help@cibiklaw.com

I certify that on the date of filing, a copy of the foregoing document was sent by U.S.

Mail to the following:

Joseph Corte Cann, Jr, 1453 N 56th St, Philadelphia, PA 19131-3905

Eric Wright, 4237 W Warminster Ave, Philadelphia, PA 19104

/s/Stephen R. Franks